

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners:

John Wine, Chair
Cynthia L. Claus, Commissioner
Brian J. Moline, Commissioner

STATE CORPORATION COMMISSION

DEC 13 2001

In the Matter of the Filing of Written)
Documents and Gas Purchase Reports by)
UtiliCorp United Inc., d/b/a Peoples Natural)
Gas Company and Kansas Public Service)
Company, as Prescribed by Commission)
Order dated June 21, 2001 in Docket No.)
106,850-U/75-GIMC-009-GIG.)

Docket No. 02-UTCG-371-GPR

 Docket
Room

PETITION TO INTERVENE

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Corporation Commission of the State of the Kansas ("Commission") for an order permitting it to intervene in the above-captioned proceeding. In support of its petition, CURB states and alleges as follows:

1. CURB is composed of five volunteer consumer advocate members and is statutorily authorized to represent the interests of Kansas residential and small commercial ratepayers in utility proceedings.

2. CURB's Consumer Counsel has been given the discretion to intervene and represent the interests of Kansas residential and small commercial ratepayers in any utility proceeding before the Commission under K.S.A. 66-1223 et seq.

3. On November 16, 2001, UtiliCorp United, Inc., d/b/a Peoples Natural Gas Company and Kansas Public Service Company ("UtiliCorp") filed a request for the Kansas Corporation Commission ("Commission") to open a utility-specific docket for UtiliCorp to utilize in filing its monthly contract summary filings and its annual written report relating to

supply and transportation contracts and purchasing practices. The application was filed in accordance with the Order issued by the Commission in KCC Docket No. 106,850-U on June 21, 2001..

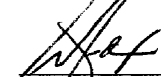
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The service received by those customers will or may be affected by any Commission order or activity in this proceeding.

5. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

6. The residential and small commercial ratepayers whose interests CURB represents will or may be bound by any Commission order or activity in this proceeding and will or may be adversely affected thereby.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE commission grant its Petition for Intervention in this Docket

Respectfully submitted,




Walker Hendrix #08835
Niki Christopher #19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, Walker Hendrix, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner; that he has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.



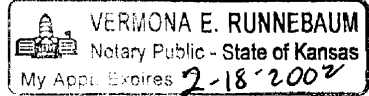
Walker Hendrix

SUBSCRIBED AND SWORN to before me this 13th day of December, 2001.



Notary of Public

My Commission expires: 2-18-2002.



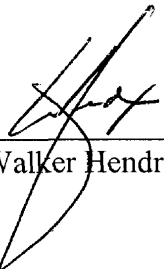
CERTIFICATE OF SERVICE

I, Walker Hendrix , hereby certify a true and correct copy of the foregoing, was hand delivered on this 13th day of December, 2001 to:

Susan Cunningham
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
Hand Delivered

Mr. Larry Headley
Peoples Natural Gas, a division of UtiliCorp
1815 Capitol Ave.
Omaha, NE 68102

James G. Flaherty
Anderson, Byrd, Richeson, Flaherty &
Henrichs
P.O. Box 17
Ottawa, KS 66067



Walker Hendrix